

Peabody, Daniel (EGLE)

From: Peabody, Daniel (EGLE)
Sent: Sunday, September 20, 2020 4:28 PM
To: Ruesch, Paul
Cc: Daniel M. Capone (DCapone@manniksmithgroup.com); Martin, Brendan; Roberts, Keegan; Bennett, Brian; Kirchner, Scott; Ruhala, Sydney (EGLE); Mills, Mark (DNR)
Subject: EGLE Comments on Area 4 TCRA Data Management Plan
Attachments: EGLE Comments_Area 4 TCRA_ DMP.xlsx

Paul,

Attached are EGLE's comments on the Area 4 data management plan. Please let me know if you have any questions.

Thanks,

Daniel Peabody
Environmental Quality Analyst
Remediation and Redevelopment Division
Michigan Department of Environment, Great Lakes, and Energy
***517-285-3924* NEW PHONE NUMBER** | PeabodyD@Michigan.gov
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1	WORK PLAN COMMENT / INPUT FORM					
2	Trowbridge Dam TCRA					
3	DOCUMENT NAME: DRAFT Data Management Plan, version 08/26/2020					
4	ITEM NO.	REVIEWER	REFERENCE TO GEI SUBMITTAL (i.e., Section X.X, Page XX)	COMMENT (+ reference(s) to support)	SUGGESTION / RECOMMENDATION	GEI Response to Comments (date)
5	1	EGLE	General	Is the Data Management Plan intended to cover all sites/areas/sample media/etc. covered under the Multi-Area QAPP (GEI 2020)?	Suggest adding clarification of applicability	
6	2	EGLE	General	Calculations of analyte totals (Total PCBs, TEQs, etc.) and general summation rules (handling of non-detects and flagged results, etc.), are not discussed.	Suggest adding a calculations section or referencing appropriate section of the QAPP	
7	3	EGLE	Section 4.1; Page 4	Sampling location figures are referenced as a possible field record/document that will be produced but tabular location information is not specified.	Tables containing sample location information should also be provided. These tables should contain information pertaining to sample ID, sample matrix, sample interval (if applicable), analyte, as well as x,y location data.	
8	4	EGLE	Section 4.1; Page 4	Soil/Sediment core logs and other relevant sample metadata are not specified in the data records to be produced. Will soil characteristics and related information be retained within the project database or as hard copy logs only?	Suggest specifying electronic storage of all records either in the project database or as scanned (i.e. PDF) data files. Also suggest specifying the extent and storage location/medium of relevant sample metadata.	
9	5	EGLE	Section 4.1; Page 4	Additional documentation denoting biased vs. unbiased sample collection has previously been discussed as needing to be integrated into each sample's data fields stored within the project database to allow for appropriate data use in the future. However, this data field and other applicable sample metadata (soil/sediment core characteristics, fish species/size/gender, etc.) are not specified here.	Suggest specifying sample collection program intent among other meta-data considerations (core logging, fish species/size/gender, etc.) in the Data Records section	
10	6	EGLE	Section 6.7; Page 8	First sentence states: "GEI will maintain field and analytical data in a single EQUIS Professional database with each area (2, 3, 4) represented as an EQUIS facility."	Unless previously direct by EPA, consider listing the individual areas as sub facilities to a Kalamazoo River Superfund facility. This will more readily facilitate performing queries and reporting across project areas.	

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11	7	EGLE	Section 6.7; Page 8	Fourth sentence states: "Project personnel will have the ability to view data using the secure Data Interpretation, Visualization, Exploration, and Reporting (DIVR) web-based application."	Will representatives from EPA and the partner agencies (EGLE, MDNR, etc.) have access to the DIVR web site?	
12	8	EGLE	Appendix A Section 6	This section include additional requirements for the DMP regarding data management, acquisition, types, analysis, summary, and reporting that are not explicitly covered in the DMP.	Additional detail in DMP to meet requirements of Appendix A.	

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13	9	EGLE	Appendix A Section 7	<p>An Information Sharing and Restrictions on Information Memorandum of Understanding (MoU) is referenced in this section. Is it anticipated that EGLE will be a party to this MoU? Without being able to review the MoU it is difficult to comment on whether or not such a document would be acceptable.</p> <p>Section 7 of the DMP also describes the proposed flow of information. In general, that Section states that all data would be submitted to the USEPA and requests for data from stakeholders (i.e. EGLE) would go to USEPA. EGLE has and continues to maintain our own site-wide database. For other Areas of Operable Unit 5, EGLE and the USEPA receive data at the same time. Ideally, a single, centralized, and "live" site-wide database would be created, regularly updated, and available for query by any party that is trying to obtain data. That way all parties are working with the same dataset and the flow of information is not restricted or delayed by requests that have to be processed. That was the original goal of the project team when data handling discussions were initiated by EGLE in 2017.</p> <p>For Areas of OU5 where NCR and GEI have agreed to perform work, many of the details discussing and governing the transfer of data between the State, EPA, and NCR are in the proposed Consent Decree (CD) and Appendix B - Statement of Work (SOW) (see some example text below from Paragraph 10.7 of the SOW).</p> <p>Paragraph 10.7(b) Quality Assurance Project Plan: (7) For EPA and the State to take any additional samples that they deem necessary; (8) For EPA and the State to provide to SD, upon request, split samples and/or duplicate samples in connection with EPA's and the State's oversight sampling; and (9) For SD to submit to EPA and the State all sampling and tests results and other data in connection with the implementation of the CD.</p> <p>To-date, the State has been willing to provide any and all data or information that has been requested by NCR and GEI (and other Responsible Parties and their consultants). Language in the DMP, MoU, QAPP (and other documents) should be consistent with the requirements (and flow of information) outlined in the CD and SOW. The State would not accept or sign an agreement that limits our ability to receive information, puts unreasonable obligations on the State, or is inconsistent with the requirements and agreements that are in the CD and SOW. EGLE agrees that a "standard format" for the site is ideal and would be willing to put data generated by the collection of split samples under investigations that are performed by NCR and GEI (and approved by the USEPA) or through the implementation of State-led investigations that are approved by the USEPA in to the "standard format" (or the format that is preferred by the USEPA). However, data collected for other purposes may not be provided in the "standard format".</p> <p>This Site is also unique in that the people of the state of Michigan are also a primary landowner at the Superfund site. The Michigan Department of Natural Resources (MDNR) manages property within and surrounding the Superfund site on behalf of the people of the State of Michigan where National Cash Register (NCR) and GEI (and other Responsible Parties and their consultants) have and will be performing work (i.e. sample collection, remediation, etc.). A term of the Land Use Permit that are issued by MDNR for the Superfund site and other work performed on State-owned property is that all data and information gathered is required to be submitted to the State when the permitted activities are complete.</p>	Clarify data sharing and privacy agreements in DMP	
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15	10	EGLE	Appendix A Section 4	"Split sampling data (i.e., contractor to EGLE or EPA Superfund Technical Assessment and Response Team [START] Tetra Tech) will be provided to LLC during the project following an established procedure and in a consistent (EDD) reporting format" - No reference to the established procedure for providing split samples to the LLC is provided.	Reference and/or attach established project split sampling procedures.	